

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

TS EMPLOYMENT, INC.,

Debtors.

JAMES FELTMAN, not individually but  
solely as chapter 11 trustee for TS  
Employment, Inc.,

Plaintiff,

- against -

KOSSOFF & KOSSOFF LLP and IRWIN  
KOSSOFF,

Defendants.

No. 19-cv-8087-NSR

No. 15-bk-10243-MG

No. 18-ap-1649-MG

**STIPULATION AND ORDER**

WHEREAS, Defendants have moved to withdraw the reference of the above-captioned adversary proceeding for purposes of trial;

WHEREAS, Plaintiff has represented in his Response that he does not oppose withdrawal of the reference upon completion of all pretrial proceedings; and

WHEREAS, the Case Management and Scheduling Order, entered September 10, 2019, set March 11, 2020 as the fact discovery cutoff, March 25, 2020 as the deadline to request a pre-motion conference pursuant to Local Bankruptcy Rule 7056-1, April 10, 2020 as the expert discovery cutoff, and June 2, 2010 at 10:00 a.m. as the date and time for the final pretrial conference.

NOW, THEREFORE, the parties hereby stipulate and agree as follows, by and through their undersigned counsel:

1. The motion to withdraw the reference of the adversary proceeding shall be held in abeyance pending the completion of pretrial proceedings before the Bankruptcy Court.

2. The parties shall submit a joint status report to this Court prior to the completion of pretrial proceedings in the adversary proceeding.

Dated: September 11, 2019

JENNER & BLOCK LLP

/s/ 

Richard Levin

Carl Wedoff

919 Third Avenue

New York, New York 10022

(212) 891-1600

rlevin@jenner.com

cwedoff@jenner.com

- and -

Vincent E. Lazar

353 North Clark Street

Chicago, Illinois 60654

(312) 222-9350

vlazar@jenner.com

*Attorneys for Plaintiff James Feltman, as  
Chapter 11 Trustee*

STORCH AMINI PC

/s/ 

Steven G. Storch

Jeffrey Chubak

140 East 45<sup>th</sup> Street, 25<sup>th</sup> Floor

New York, New York 10017

(212) 490-4100

sstorch@storchamini.com

jchubak@storchamini.com

*Attorneys for Defendants Kossoff & Kossoff  
LLP and Irwin Kossoff*

Dated: September \_\_\_\_, 2019

So ordered:

\_\_\_\_\_  
Honorable Nelson S. Román  
United States District Judge